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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JAVIER CABRERA, et al.

Plaintiffs,

vs.

SERVICE EMPLOYEES

INTERNATIONAL UNION, et al.,

Defendants.

Case No.: 2:18-cv-00304-RFB-DJA

**STIPULATION TO EXTEND
DEADLINE TO FILE REPLY IN
SUPPORT OF MOTION TO
BIFURCATE TRIAL**

(FIRST REQUEST)

Pursuant to LR IA 6-1, Plaintiff Debbie Miller and Defendants Service Employees International Union (“SEIU”) and Clark County Public Employees Association dba Nevada Service Employees Union (“Local 1107”) (collectively the “Parties”), acting through their respective counsel of record, respectfully submit this Stipulation to Extend Deadline to file a Reply Brief in Support of the Defendants’ Motion to Bifurcate Trial (ECF 269). This is the first request for an extension of time to file a Reply in support of said motion.

On Friday, October 13, 2023, Plaintiff Debbie Miller filed an Opposition to Defendants’ Motion to Bifurcate Trial. Daryl Martin has been tasked with preparing Defendants’ Reply brief, but he has been unable to devote time to the matter, having

1 traveled outside the State of Nevada during two of the four intervening weekdays
 2 since Miller filed her Opposition. Miller's counsel has therefore agreed to extend the
 3 deadline to file a Reply brief by one week, from October 20 to October 27, 2023.
 4 This extension is being requested in good faith and will not delay further proceedings
 5 in this Case.

6 CHRISTENSEN JAMES & MARTIN

ROTHNER, SEGALL & GREENSTONE

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By: /s/ Eli Naduris-Weissman

8 Daryl E. Martin, Esq.

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21 ORDER

22 Good cause appearing, the Court grants the foregoing Stipulation to Extend
 23 Deadline to file Reply Brief in Support of Motion to Bifurcate Trial. Defendants'
 24 Reply brief shall be filed on or before October 27, 2023.

25 

26 United States District Court Judge

27 Dated: October 20, 2023